

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

ATLANTIC CREDIT & FINANCE, INC.,))	
)	
Plaintiff/Counter Defendant,)	
)	
vs.)	No. 1:15-cv-00044-MJD-SEB
)	
JULIANA G. ROBERTSON,)	
)	
Defendant/Counter Plaintiff.)	

PLAINTIFF'S PRELIMINARY WITNESS AND EXHIBIT LIST

Pursuant to the Case Management Order issued on March 17, 2015, Plaintiff Atlantic Credit & Finance, Inc. submits its preliminary list of witnesses and exhibits that it expects may be introduced at trial. Plaintiff reserves the right to supplement or amend this list at any time prior to trial.

Preliminary Witness List

1. Kevin E. Bowens, General Counsel: Atlantic Credit & Finance, Inc., 3353 Orange Avenue, Roanoke, VA 24012; 1-800-888-9419 (for the following employees, simply "Atlantic").
2. Sarah Wilson, Director of Compliance and Client Services: Atlantic.
3. Stacy Davis, Vendor Management Administrator: Atlantic.
4. Durmon Coates, Leal Auditor: Atlantic.
5. Carol Jodrey, (former) Director of Litigation: contact information not yet known.
6. Angel Hill, Attorney Relationship Manager: Atlantic.
7. Cameron Gray, Attorney Relationship Manager: Atlantic.
8. Damon Bailey, Attorney Relationship Manager: Atlantic.

9. Rebecca Blanchard, Litigation Coordinator: Atlantic.
10. Danny Ellinwood, Litigation Coordinator: Atlantic.
11. Ramona Worrell, Litigation Coordinator: Atlantic.
12. Amanda "AJ" Dunbar, Software Administrator/EDI Analyst: Atlantic.
13. Heather Clary, Assistant Director of Compliance: Atlantic.
14. Sarah F. Wilson, Paralegal: Atlantic.
15. Kevin Hudson, Vice President of Business Development: Atlantic.
16. Waurayne Jordan, Litigation Department Manager: Atlantic.
17. Juliana G. Robertson, Defendant/Party, c/o Gary Sallee, Esq., 11650 Olio Road, Suite 1000, Fishers, IN 46037; 317-416-9543.
18. Jeannie Dewbrew or Jeannie Mahlman, Paralegal in the Law Office of Juliana G. Robertson; personal contact information not yet known; business contact information: 7915 S. Emerson Avenue, Suite B-230, Indianapolis, IN 46237; 317-222-1812.
19. Any knowledgeable employee, agent or representative of the Law Office of Juliana G. Robertson, 7915 S. Emerson Avenue, Suite B-230, Indianapolis, IN 46237.
20. Any person identified in any discovery response including document production.
21. Any person identified in any deposition in this action.
22. Any person identified within any witness list of defendant.
23. Any subsequently identified expert witness.
24. Any person necessary to authenticate or introduce an exhibit.
25. Any witness for impeachment or rebuttal.

Preliminary Exhibit List

1. Case files or client files, including dockets.
2. Agreements between the parties.
3. E-mail and written correspondence either between the parties or concerning all collection efforts.
4. Atlantic Credit & Finance procedures, policies, compliance manuals and attorney work standards.
5. Invoices or itemized costs spreadsheets.
6. Records, documents, ledgers, spreadsheets or receipts showing payment of advance costs.
7. Bank deposits and/or statements showing receipt of advance costs.
8. Memorandum regarding cost invoices.
9. Check history report.
10. Audit reports.
11. Plaintiff's federal and/or state income tax returns.
12. Deposition testimony of Plaintiff.
13. Deposition testimony of any person deposed in this matter.
14. Any document produced during discovery.
15. Any paper filed or order entered in this litigation.
16. Any discovery request or response.
17. Any document identified in any exhibit list of Defendant.
18. Any document proffered for impeachment or rebuttal.

Respectfully submitted,

ATLANTIC CREDIT & FINANCE, INC.

/s/ William S. Hackney
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/s/ Jeanne M. Hamilton
Jeanne M. Hamilton (#16053-49)
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jhamilton@saLAWus.com

CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which sent notification of such filing to the following attorney of record:

Gary D. Sallee
11650 Olio Road, Ste. 1000
Fishers, IN 46037
gdsallee@gmail.com

/s/ Jeanne M. Hamilton
Jeanne M. Hamilton